

**Application No. 09/825,918**

references is clearly not flat. More particularly, the shield 40 of these two Kinman references is not “a single, completely flat non-magnetized ferromagnetic plate,” as recited in amended independent claim 22.

Rather, the shield 40 of these two Kinman references is generally U-shaped and cross-section, as can be clearly seen in Figure 3 of both Kinman references. By way of contrast, the non-magnetized ferromagnetic plate of the present invention is completely flat, and thus does not have the U-shaped cross-section of the Kinman shield 40.

In his rejection of claims 22-24 under 35 U.S.C. § 102(e) as being met by either of Kinman ‘999 or Blucher *et al*, the Examiner further stated the “Each patent discloses an upper coil, a lower coil and a single, uniformly flat non-magnetized, ferromagnetic plate 41 disposed between the coils.” However, the shield 40 of the Kinman ‘999 reference, like the shields 40 of the Kinman ‘520 and ‘966 references, has upwardly extending flanges 42 and 43 (as shown in Figure 10 thereof), which are generally U-shaped in cross-section (as shown in Figure 3 thereof) and which are not completely flat.

The plate 4 of the Blucher *et al.* reference similarly has upwardly extending side walls 42 and 43 and is thus also generally U-shaped in cross-section and not completely flat.

Thus, none of the cited references, taken either alone or in combination with one another, either disclose or make obvious “a single, completely flat, non-magnetized, ferromagnetic plate disposed between the upper coil,” and the recited in amended claim 22.

In view of the foregoing, it is respectfully submitted that the subject patent application is in a condition for immediate allowance. Reconsideration and an early allowance is therefore respectfully requested.

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Respectfully submitted,  
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**VERSION WITH MARKINGS TO SHOW CHANGES**

**IN THE SPECIFICATION:**

This patent application is a divisional patent application of United States serial No. 09/014,839 filed on January 28, 1998, which issued as United States Patent No. 6,291,758 on September 18, 2001.

**IN THE CLAIMS**

22. (Amended) A pickup comprising:  
an upper coil;  
a lower coil; and  
a single, uniformly completely flat non-magnetized ferromagnetic plate disposed between the upper coil and the lower coil.